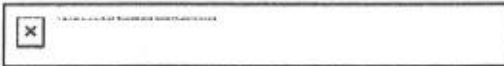


Carrie Ray

From: sop@cscinfo.com
Sent: Thursday, January 10, 2019 5:50 PM
To: Carrie Ray
Subject: Notice of Service of Process - Transmittal Number: 19203019



NOTICE OF SERVICE OF PROCESS

Transmittal Number: 19203019

(Click the Transmittal Number to view your SOP)

Pursuant to client instructions, we are forwarding this summary and Notice of Service of Process.

Entity:	Menard, Inc.
Entity I.D. Number:	0033810
Entity Served:	Menard, Inc.
Title of Action:	Lucyna E. Sopala vs. Menard, Inc.
Document(s) type:	Summons/Complaint
Nature of Action:	Personal Injury
Court/Agency:	Cook County Circuit Court, Illinois
Case/Reference No:	2018L013858
Jurisdiction Served:	Illinois
Date Served on CSC:	01/10/2019
Answer or Appearance Due:	30 Days
Originally Served On:	CSC
How Served:	Personal Service

Sender Information:

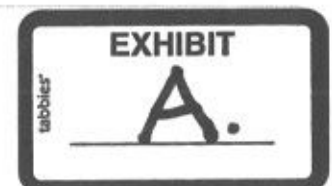
Jason H. Sherwood
312-627-1650

Primary Contact:

Michael O'Brien
Menard, Inc.

Electronic copy provided to:

Joseph Hanson
Amanda Ratliff
Carrie Ray



Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the document(s) and taking appropriate action.

251 Little Falls Drive, Wilmington, Delaware 19808-1674
(888) 690-2882 | sop@cscglobal.com

Summons - Alias Summons

(12/31/15) CCG N001

FILED

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

12/26/2018 1:09 PM

LUCYNA E. SOPALA

No.

DOROTHY BROWN

v.

MENARD, INC.

Defendant Address:

MENARD, INC.

R/A PRENTICE HALL CORPORATION

801 ADLAI STEVENSON DRIVE

SPRINGFIELD, IL 62703

CIRCUIT CLERK

COOK COUNTY, IL

2018L013858

☒ SUMMONS ☐ ALIAS - SUMMONS

To each defendant:

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance, and pay the required fee, in the Office of the Clerk of this Court at the following location:

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> Richard J. Daley Center, 50 W. Washington, Room 801, Chicago, Illinois 60602 | | |
| <input type="checkbox"/> District 2 - Skokie
5600 Old Orchard Rd.
Skokie, IL 60077 | <input type="checkbox"/> District 3 - Rolling Meadows
2121 Euclid 1500
Rolling Meadows, IL 60008 | <input type="checkbox"/> District 4 - Maywood
Maybrook Ave.
Maywood, IL 60153 |
| <input type="checkbox"/> District 5 - Bridgeview
10220 S. 76th Ave.
Bridgeview, IL 60455 | <input type="checkbox"/> District 6 - Markham
16501 S. Kedzie Pkwy.
Markham, IL 60428 | <input type="checkbox"/> Richard J. Daley Center
50 W. Washington, LL-01
Chicago, IL 60602 |

You must file within 30 days after service of this Summons, not counting the day of service.

IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE RELIEF REQUESTED IN THE COMPLAINT.

To the officer:

This Summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this Summons shall be returned so endorsed. This Summons may not be served later than thirty (30) days after its date. 12/26/2018 1:09 PM DOROTHY BROWN

☒ Atty. No.: 47294

Name: Sherwood Law Group LLC

Atty. for: Plaintiff

Address: 218 N. Jefferson Street, Ste. 401

City/State/Zip Code: Chicago, IL 60661

Telephone: 312-627-1650

Primary Email Address: jhs@sherwoodlawgroup.com

Secondary Email Address(es):

mas@sherwoodlawgroup.com

mer@sherwoodlawgroup.com

Witness:

DOROTHY BROWN, Clerk of Court

Date of Service:

(To be inserted by officer on copy left with Defendant or other person)

**Service by Facsimile Transmission will be accepted at:

(Area Code) (Facsimile Telephone Number)



DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

FILED

12/26/2018 1:09 PM

DOROTHY BROWN

CIRCUIT CLERK

COOK COUNTY, IL

2018L013858

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

LUCYNA E. SOPALA,

Plaintiff,

v.

MENARD, INC.,

Defendants.

No:

COMPLAINT AT LAW

NOW COMES the Plaintiff, LUCYNA E. SOPALA, by and through her attorneys, SHERWOOD LAW GROUP, LLC, and in her complaint at law against the Defendants, MENARD, INC. hereby states as follows:

GENERAL ALLEGATIONS

1. That on or about January 15, 2017, Plaintiff LUCYNA E. SOPALA was a resident of City of Chicago, County of Cook, State of Illinois.
2. That on or about January 15, 2017, Defendant MENARD, INC., was an Illinois corporation with its registered agent located 801 Adlai Stevenson Drive, Springfield, Illinois 62703.
3. That on or about January 15, 2017 and for a long time prior thereto, the Defendant, MENARD, INC., owned, operated, maintained, possessed and controlled the property, including the curb and sidewalk located therein, at 3215 W. North Avenue, City of Melrose Park, County of Cook and State of Illinois ("Property") and was doing business there as a Menard's.
4. That on or about January 15, 2017, the Defendant, MENARD, INC., operated, maintained, managed, and controlled the construction, maintenance, repair and cleaning of the aisles, shelves, and area around the cleaning supplies located on the second floor of the Property

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hereinafter referred to as "Cleaning Supply Aisle".

5. That on or about January 15, 2017, the Defendant, MENARD, INC., failed to warn the Plaintiff of the dangerous and hazardous condition of the slippery substances and cleaning scent balls/pellets from the Cleaning Supply Aisle on the Property.

6. That on or about January 15, 2017, the Defendant, MENARD, INC. did not properly repair and maintain the Cleaning Supply Aisle on the Property.

7. That on or about January 15, 2017, the Defendant, MENARD, INC. did not properly clean and remove cleaning scent balls/pellets on the Property.

8. That on or about January 15, 2017, the Defendant, MENARD, INC., failed to properly inspect the Cleaning Supply Aisle on the Property on the Property to determine whether it was proper for safe usage by invitees, employees, patrons, and the public.

9. That on and prior to January 15, 2017 MENARD, INC. had notice and knowledge of the Cleaning Supply Aisle on the Property being dangerous and hazardous and susceptible to slip, trip and falls.

10. That on or about said date, the Plaintiff, LUCYNA E. SOPALA, was lawfully upon the Property as a customer and invitee of Menard's walking within the Property within or near the Cleaning Supply Aisle.

11. That at all times material herein, the Plaintiff, LUCYNA E. SOPALA, was in the exercise of ordinary care and caution for her own safety.

COUNT ONE (1) NEGLIGENCE AGAINST MENARD, INC.

12. Plaintiff re-asserts and re-alleges Paragraphs one (1) through eleven (11) of Plaintiffs' General Allegations as paragraph twelve (12) of Count I herein.

13. That it then and there became and was the duty of the Defendant, MENARD, INC., to exercise reasonable care to maintain, manage, repair, design, stack, place, and construct

the Cleaning Supply Aisle, shelves, and area around the cleaning supplies in a reasonably safe condition for the safety of the general public, customers, its employees, invitees, the Plaintiff, and those persons lawfully upon and around said Property.

14. That not regarding its duty aforesaid, the Defendant, MENARD, INC., by its duly authorized agents, servants and/or employees, was guilty of one or more of the following careless and negligent acts and/or omissions:

- a) Carelessly and negligently failed to inspect the Property and Cleaning Supply Aisle and maintain it in a safe condition;
- b) Carelessly and negligently failed to warn pedestrians, including the Plaintiff, that the Property and Cleaning Supply Aisle was unsafe and hazardous by reason of a slippery surface which created a hazard;
- c) Carelessly and negligently failed to repair the unsafe and hazardous condition located on the Property and Cleaning Supply Aisle for an unreasonably long period of time;
- d) Carelessly and negligently failed to properly maintain the Cleaning Supply Aisle within said Property;
- e) Carelessly and negligently undertook or failed to undertake a maintenance or construction project or cleaning project to repair the Cleaning Supply Aisle within the Property which created a dangerous and hazardous condition to pedestrians, invitees and employees;
- f) Carelessly and negligently supervised its employees and subcontractors from creating a dangerous and hazardous condition to pedestrians, invitees and employees including the Plaintiff;
- h. Carelessly and negligently failed to remove or sweep up cleaning scent balls/pellets in the Cleaning Supply Aisle and the Property;
- i. Carelessly and negligently failed to stack and seal boxes of cleaning scent balls/pellets which created a dangerous and unsafe condition on the Property;
- j. Carelessly and negligently supervised, trained, or contracted with a third party to repair, maintain, service, and inspect the Cleaning Supply Aisle and the Property;
- k. Carelessly and negligently placed open boxes of cleaning scent balls/pellets in the Cleaning Supply Aisle which created which created a dangerous and hazardous condition;
- l. Failed to secure packaging on a display shelf which created a dangerous and hazardous condition;
- m. Carelessly and negligently allowed a pedestrian walkway to remain in disrepair for an unreasonably long period of time; and
- n. Was otherwise careless and negligent in the control, repair, maintenance, construction, cleaning, sweeping and service of the Property.

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15. That as a direct and proximate result of one or more of the aforesaid careless and negligent acts or omissions of the Defendant, MENARD, INC., the Plaintiff, LUCYNA E. SOPALA, was caused to and did trip and fall to the ground.

16. That as a direct and proximate result of the aforesaid, the Plaintiff, LUCYNA E. SOPALA, suffered diverse injuries, both internally and externally, of a permanent and lasting nature, which have caused and will continue to cause pain in body and mind; and the Plaintiff, was caused to expend and in the future will be compelled to expend, large sums of money for medical care in endeavoring to be cured of said injuries; and the Plaintiff was caused to and did lose much time from her employment, thereby incurring losses of large sums of money; and the Plaintiff has been and in the future will be prevented from attending to her usual affairs and duties.

WHEREFORE, Plaintiff, LUCYNA E. SOPALA, by and through her attorneys, SHERWOOD LAW GROUP, LLC, hereby prays for judgment against Defendant, MENARD, INC., for a sum of money in excess of FIFTY THOUSAND DOLLARS [\$50,000.00], and such additional amounts as the jury and the Court shall deem proper and appropriate under the circumstances provided herein, inclusive of the costs of bringing this action.

Respectfully Submitted,

SHERWOOD LAW GROUP, LLC

Jason H. Sherwood

JASON H. SHERWOOD

Attorney for Plaintiff

SHERWOOD LAW GROUP, LLC

218 N. Jefferson, Suite #401

Chicago, Illinois 60661

Phone: 312.627.1650

Fax: 312.648.9503

Attorney No. 47294